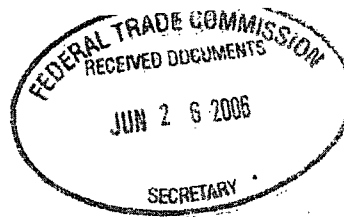


June 14, 2006

Federal Trade Commission, Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580



Re: Business Opportunity Rule, R511993

Dear Sir or Madam,

I am very concerned about the possibility of Business Opportunity Rule R511993 being adopted in its present form. As a Certified Natural Health Professional, I advise my clients on diet and natural therapies. Most of the nutritional supplements I recommend and make available to my clients are marketed through direct-selling or network marketing companies, including but not limited to Nature's Sunshine Products, Mannatech, Life Force and Waiora. I find that these highly reputable companies produce unique products that are unavailable from any other companies in the retail market. Over the last 16 years that I have been in this profession, approximately 50 percent of my income has come from product sales and bonuses as a distributor for these companies. Should this ruling be passed as it is currently written, my livelihood would be severely undermined.

The average product purchase at any one sales transaction is typically \$40, with the highest amount of products purchased from any one company rarely exceeding \$200. My clients purchase these products because they need them at the time I meet with them. To have to wait seven days after signing up as a distributor before being able to purchase these products wholesale or at distributor prices is ludicrous and defeats the purpose for which they wish to get them. These are safe, minimally priced nutritional supplements which cause no harm to the public. People buy cars, TV's and other much more costly items without such an extensive waiting period.

Most of the people I work with who sign up as distributors, do so simply to get a discount on the products and do not do it for the business opportunity. For those who eventually decide to participate in the business opportunity, the proposed waiting period gives the impression that something is wrong with the plan. In addition, the burdensome paperwork which will most likely remain unread by the public makes it extremely difficult for the individual to fully comply with the rules, thereby risking fines and other penalties for such failures, however innocent.

The public is not well served by the FTC's overregulation of an industry that is causing absolutely no harm and more than adequately polices itself by remedying any possible complaints by the public. The companies I work with comply with all applicable buy back requirements and always make it easy for individuals to exit the company if the business opportunity is not right for them.

By enforcing these proposed actions, the FTC does a disservice to the consuming public and Americans everywhere who are trying to get ahead by starting their own business or supplementing their earnings to help support their families. I understand that the FTC wishes to protect consumers, however it is clear that the proposed rule has many unintended consequences that could be avoided by a less burdensome approach. Thank you for considering my comments.

Sincerely,

[REDACTED]
Terri L. Saunders, CNHP
[REDACTED]